



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 21, 2017

Kate Ingram
Senior Product Registration Specialist
Solenis LLC
500 Hercules Road
Wilmington, DE 19808

Subject: Label Notification per PRN 2007-4 – Update Storage & Disposal Statement and
Minor Administrative Changes
Product Name: Drew 3025 Precursor
EPA Registration Number: 74655-28
Application Date: October 11, 2017
Decision Number: 535803

Dear Ms. Ingram:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 2007-4 and finds that the action requested falls within the scope of PRN-2007-4.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on non-refillable containers. The code may appear either on the label (and can be added by non-notification via PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact Killian Swift at 703-308-6346 or by email at Swift.Killian@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Wanda J. Fuller, for".

Demson Fuller, Product Manager 32
Regulatory Management Branch II
Antimicrobials Division (7510P)
Office of Pesticide Programs

DREW™ 3025 Precursor

ACTIVE INGREDIENTS:

Sodium Chlorate.....25.0%
Other Ingredients.....75.0%
TOTAL100.00%

Contains 2 pounds of Sodium Chlorate per gallon at 70°F

EPA Reg. No. 74655-28

EPA Est. No. 74655-TX-1

EPA Est. No. 53345-CAN-002

EPA Est. No. 53345-CAN-004

KEEP OUT OF REACH OF CHILDREN
CAUTION
FIRST AID

IF ON SKIN OR CLOTHING:

Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES:

Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF SWALLOWED:

Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything to an unconscious person.

IF INHALED:

Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.

Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also call 1-800-274-5263 or 1-800-ASHLAND for emergency medical treatment information.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

IN CASE OF EMERGENCY CALL
1-844-SOLENIS (1-844-765-3647)

NOTIFICATION

74655-28

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

11/21/2017

74655-28

Oct 9, 2017

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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION

Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wear long sleeved shirt, long pants, shoes, socks, and chemical resistant gloves (such as or made out of any waterproof material.)

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are neoprene and polyethylene. For more information, follow the instructions for category on the chemical-resistance category selection chart. All mixers, loaders, applicators, and other handlers must wear: long sleeve shirt and long pants, and shoes and socks.

USER SAFETY REQUIREMENTS

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water.

Keep and wash PPE separately from other laundry.

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

USER SAFETY

Users must wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

Users must remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing.

PHYSICAL OR CHEMICAL HAZARDS

DANGER: DRY DREW™ 3025 Precursor IS A STRONG OXIDIZING AGENT. Mix only with water.

Contamination may start a chemical reaction with generation of heat and possible fire and explosion. Do not contaminate with garbage, dirt, organic matter, household products, chemicals, soap products, paint products, solvents, acids, vinegar, beverages, oils, pine oil, dirty rags or any other foreign matter.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your state water board or regional office of the EPA. Do not apply directly to water, or to areas where surface water is present, or to inter-tidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of waste. Apply this pesticide only as specified on this label.

EMERGENCY HANDLING

In case of contamination or decomposition, do not reseal container. If possible, isolate container in open and well ventilated area. Flood with large volumes of water. If fire occurs, extinguish fire by applying large volumes of water. Any unopened drums near the fire should be cooled by spraying with water.

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL.

PESTICIDE STORAGE: Keep product dry in tightly closed container when not in use. Don't drop, roll or skid drums. Keep upright. Always replace cover. Store in a cool, dry, well-ventilated area away from heat or open flame.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance. Pesticide wastes are toxic.

CONTAINER DISPOSAL HANDLING: Non-refillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Offer for recycling or reconditioning if available, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

FOR INDUSTRIAL USE

FOR USE IN THE MECHANICAL GENERATION OF CHLORINE DIOXIDE AS A DISINFECTANT, OR FOR MICROORGANISM CONTROL (ONLY INTENDED FOR THOSE USE SITES INDICATED UNDER THE METHOD OF APPLICATION)

DREW 3025™ Precursor is a stabilized, non-volatile, sodium chlorate formulation specifically designed for use with the patented GENEROX™ unit for on-site generation of chlorine dioxide. Chlorine dioxide has numerous industrial applications as a disinfectant and as a chemical oxidant. Chlorine dioxide is stable and highly active over a wide pH range, will not react with ammonia nitrogen compounds, eliminates taste and odor-causing by-products such as chlorophenols, and will cause a minimum of corrosion of system metals at use dosages. When DREW™ 3025 Precursor is mixed with DREW™ 6006 acid under controlled conditions, it reacts rapidly to form chlorine dioxide and chlorine.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTANT WITH ITS LABELING.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

DOSAGE: The GENEROX™ unit provides precise metering of the chlorine dioxide precursor and the aqueous chlorine solution under controlled conditions for safe and efficient generation of chlorine dioxide solutions. The exact dosage of DREW™ 3025 Precursor will depend upon the nature and requirements of the specific application. Your Ashland Solenis representative will provide further details about dosages for your particular system.

FEEDING: The GENEROX™ unit is constructed entirely of compatible materials. DREW™ 3025 Precursor must be fed from the shipping container or a bulk storage tank of fiberglass or polyethylene construction. Equipment constructed of KYNA¹, TEFLON², PVC, or polyethylene must be used for handling DREW™ 3025 Precursor. Feed strength solutions of chlorine dioxide must be fed only through rigid PVC piping.

FEED REQUIREMENTS

Feed rates of DREW™ 3025 Precursor will depend on the severity of contamination and the degree of control desired. The exact dosage will depend on the size of the system and residual necessary for effective control. Approximately one pound of chlorine dioxide is generated from 5.7 pounds of DREW™ 3025 Precursor.

METHOD OF FEED

Large amounts of chlorine dioxide can be generated from DREW™ 3025 Precursor with many reducing agents including methanol, sodium chloride, hydrogen peroxide, sulfur dioxide and electrochemical. Not for use in the manufacture of paper and paperboard products that will come into contact with food. Consult instructions on the chlorine dioxide generation system before using DREW™ 3025 Precursor.

METHOD OF APPLICATION

Chlorine dioxide generation must take place only under controlled conditions within a chlorine dioxide generator. The generator reacts DREW™ 3025 Precursor with a 78% sulfuric acid to produce an aqueous solution of chlorine dioxide. This solution is then added at a point in the system to be treated. Production rate of chlorine dioxide is based on the specific application, severity of contamination, desired control and residual necessary for effective control. Chlorine dioxide must always be introduced to the system below the water at a point of adequate mixing and distribution.

RECIRCULATING AND NON-RECIRCULATING AND ONCE THROUGH COOLING WATER

SYSTEMS: For control of microbiological and algae contamination in cooling water systems. An intermittent or a continuous application must be used. For continuous application, a residual chlorine dioxide concentration between 0.10 and 1.0ppm must be achieved. If using intermittent application, a residual of chlorine dioxide concentration between 0.10 to 5.00ppm during feed cycle must be achieved. Chlorine dioxide must be added to water well, process water loop, and cooling tower basin. For the control of mollusks, a continuous or intermittent application must be used. To remove adult mollusks on an intermittent basis, a chlorine dioxide residual of 0.10 to 0.50ppm must be achieved. For continuous application, a chlorine dioxide residual of 0.10 to 0.25ppm must be achieved. To prevent the settlement of mollusk veligers in cooling water systems, a chlorine dioxide residual of 0.10 to 0.50ppm must be achieved.

GENERAL INDUSTRIAL PROCESS WATER TREATMENT (WHITE WATER PAPER MILL SYSTEMS, FRESH WATER PAPER MILLS): For control of microbial contamination in papermaking and general industrial water systems. An intermittent or a continuous application must be used. For continuous application, a residual chlorine dioxide concentration between 0.10 and 5.00ppm must be achieved. If using intermittent application, a residual chlorine dioxide concentration must be maintained between 0.10 to 5.00ppm during feed cycle.

WASTEWATER DISINFECTION: Municipal and industrial sewage and wastewater disinfection must be achieved with a chlorine dioxide residual of 0.5 to 5.00ppm.

IMPORTANT NOTICE: Seller warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated on the label under normal conditions of use. THE FOREGOING WARRANTIES ARE EXCLUSIVE AND ARE IN LIEU OF ALL OTHER WARRANTIES, WHETHER WRITTEN, ORAL OR IMPLIED. THE WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE, IN OTHER RESPECTS THAN AS EXPRESSLY SET FORTH HEREIN, ARE EXPRESSLY EXCLUDED AND DISCLAIMED.

~~TM Trademark and © Registered trademark of Ashland Inc.~~

¹ KYNAR is a registered trademark of Pennwalt Corp.

² TEFLON is a registered trademark of E.I. Dupont De Nemours & Co.

~~Hercules Incorporated, A wholly owned subsidiary of Ashland Inc.~~ **Solenis LLC**

500 Hercules Rd

Wilmington, DE 19808

(302) 594-5000

Emergency Phone Number

1-800-ASHLAND (1-800-274-5263) 1-844-SOLENIS (1-844-765-3647)

mmyy [where mm is two numerical digit month and yy is two numerical digit year to be used to identify label version]

[Note to reviewer: information in [] will not appear on marketplace label]

Sold by Solenis LLC